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 Las Vegas, Nevada 89106
 gma@albrightstoddard.com

*Attorneys for Plaintiff/Counter-Defendant
 Softwind Capital LLC and Third Party
 Defendants Clayton Straub and Tim Donmoyer*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SOFTWIND CAPITAL, LLC, an Arizona
 limited liability company,

Plaintiff,

v.

GLOBAL PROJECT SOLUTIONS, LLC, a
 Nevada limited liability company, ERIC
 BROMENSHENKEL, JOYCE
 KNOBLAUCH, CINDY RISINGER, BO
 BINGHAM, DURSUM KERANOVIC, and
 SANJAY IJERY

Defendants.

CASE NO. 2:11-CV-02057-JCM-GWF

VOLUNTARY DISMISSAL

AND

ORDER FOR DISMISSAL

AND RELATED CLAIMS.

COME NOW, the following parties: Softwind Capital LLC ("Softwind"), Clayton Straub, Tim Donmoyer, Global Project Solutions LLC ("GPS"), Eric Bromenshenkel, Joyce Knoblauch, Cindy Risinger, and Bo Bingham and submit the following Voluntary Dismissal and Order for Dismissal, with prejudice:

RECITALS

1. This case arises from a certain financial transaction that was to be administered by

1 Dursum Keranovic, Sanjay Ijery, and Andreas Kabbadias. Keranovic and Ijery introduced the
2 transaction to Knoblauch and Bromenshenkel. Bromenshenkel introduced the transaction to Softwind,
3 Donmoyer and Straub. Knoblauch introduced the transaction to Risinger and Bingham.

4 2. Softwind, Donmoyer, Straub, Bingham, Bromenshenkel, Knoblauch, and Risinger
5 invested or contributed money, directly or indirectly, towards the transaction or towards setting up the
6 transaction. The agreement between these parties provided that each understood the risks of the
7 transaction, was willing to accept those risks, and each was to conduct their own due diligence
8 concerning the transaction.

9 3. Keranovic, Ijery, and Kabbadias failed to complete the transaction and failed to return
10 the funds.

11 4. Softwind initiated this matter on December 21, 2011 with the filing of its Complaint.
12 Softwind brought claims against GPS, Bromenshenkel, Knoblauch, Risinger, and Bingham alleging
13 they were at fault for the failed transaction. Bingham, Bromenshenkel, Knoblauch, and Risinger
14 denied Softwind's claims and asserted claims against Softwind, Straub, and Donmoyer for defamation
15 and abuse of process based on Softwind's allegations that, Bromenshenkel, Knoblauch, Bingham, and
16 Risinger were responsible for the failed transaction.

17 5. During the course of these proceedings certain financial documents were produced
18 evidencing that none of the money contributed to the transaction ever went to Bingham, Knoblauch, or
19 Risinger.

20 6. The parties have agreed to voluntarily dismiss this matter, in its entirety, with
21 prejudice.

22 WHEREFORE, Softwind, Straub, Donmoyer, GPS, Bromenshenkel, Knoblauch, Risinger, and
23 Bingham (collectively the "STIPULATING PARTIES") now enter into the following stipulations:

24 **STIPULATIONS**

25 The STIPULATING PARTIES agree and stipulate as follows:

26 1. That the STIPULATING PARTIES each waive, release and forever discharge any and
27 all actual or potential claims, counter-claims, cross-claims, or third party claims arising out of the
28 failed transaction and which have been asserted in this case; and

2. That the above-entitled action shall be dismissed in its entirety with prejudice, pursuant to FRCP 41, with each party to bear its own attorneys fees and costs.

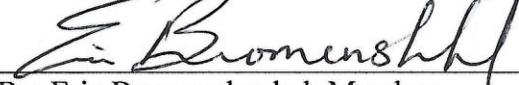
Dated this 10th day of December 2013.

**LEWIS BRISBOIS BISGAARD
& SMITH LLP**

by

Marc S. Cwik, Esq., NV Bar No. 6946
Adam J. Pernsteiner, Esq., NV Bar No. 7862
6385 S. Rainbow Blvd., Suite 600
Las Vegas, NV 89118
Attorneys for Defendant Bo Bingham

GLOBAL PROJECT SOLUTIONS, LLC


By: Eric Bromenshenkel, Member

By: Joyce Knoblauch, Member

By: Cindy Risinger, Member

By: Bo Bingham, Member

BO BINGHAM

Counterclaimant, Cross-Claimant,
Third Party Plaintiff (*pro se*)

CINDY RISINGER

Defendant, Counterclaimant, Cross-Claimant,
Third Party Plaintiff Cindy Risinger (*pro se*)

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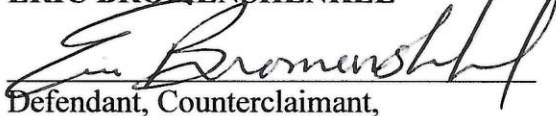
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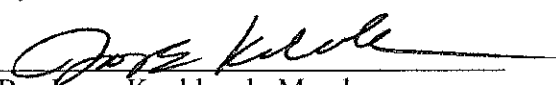
Dated this _____ day of _____ 2013.

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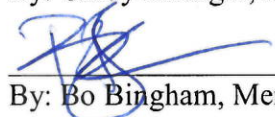
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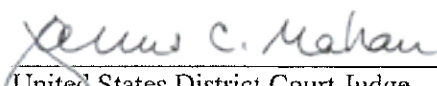
ORDER

Upon review of the above Recitals and Stipulations, and good cause appearing,

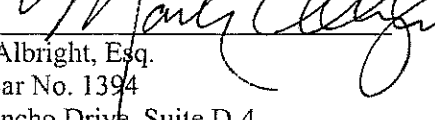
IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the parties each waived, released and forever discharged any and all actual or potential claims, counter-claims, cross-claims, or third party claims arising out of the allegations in the Plaintiff's Complaint on file herein; and

IT IS HEREBY FURTHER ORDERED, ADJUDGED AND DECREED that the above-entitled action is dismissed in its entirety WITH PREJUDICE, pursuant to FRCP 41, with each party bearing its own costs and attorneys fees.

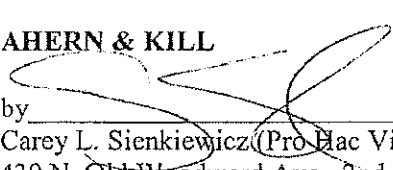
Dated December 26, 2013.


United States District Court Judge

ALBRIGHT, STODDARD, WARNICK & ALBRIGHT

by 
G. Mark Albright, Esq.
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801 S. Rancho Drive, Suite D-4
Las Vegas, Nevada 89106
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*Attorneys for Plaintiff/Counter-Defendant
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of LEWIS BRISBOIS BISGAARD & SMITH LLP and that on this 20th day of December, 2013, I did cause a true copy of the foregoing **VOLUNTARY DISMISSAL AND ORDER FOR DISMISSAL** to be sent via **United States Mail, First Class Mail International**, addressed as follows:

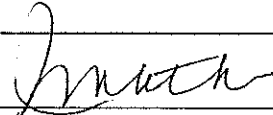
<i>Attorney</i>	<i>Party</i>	<i>Phone/Fax</i>
Dursum Keranovic 2520 Woodfield Avenue Niagara Falls, ON L2J 3B1 CANADA	Dursum Keranovic	1 905 341 2378

I further certify that I did cause a true copy of the foregoing **VOLUNTARY DISMISSAL AND ORDER FOR DISMISSAL** to be placed in the **United States Mail**, first class postage prepaid thereon, addressed as follows:

<i>Attorney</i>	<i>Party</i>	<i>Phone/Fax</i>
G. Mark Albright, Esq. Albright, Stoddard, Warnick & Albright 801 South Rancho Drive, Suite D-4 Las Vegas, NV 89106	Attorneys for Plaintiff/Counter Defendant Softwind Capital LLC and Third-Party Defendants Clayton Straub and Tim Donmoyer	(702) 384-7111 (702) 384-0605 Fax
Joseph A. Ahern, Esq. Carey L. Sienkiewicz, Esq. (Pro Hac Vice) Ahern & Kill 430 North Old Woodward, Second Floor Birmingham, MI 48009	Attorneys for Plaintiff/Counter Defendant Softwind Capital LLC and Third-Party Defendants Clayton Straub and Tim Donmoyer	(248) 723-6101 (248) 723-6102 Fax
Global Project Solutions, LLC 840 Pinnacle Court, Suite 202 Mesquite, NV 89027	In Proper Person	
Joyce Knoblauch 10581 Co Road 95 Sauk Centre, MN 56378	In Proper Person	
Cindy Risinger 675 LaScala Drive Mesquite, NV 89027	In Proper Person	

<i>Attorney</i>	<i>Party</i>	<i>Phone/Fax</i>
Eric Bromenshenkel 1580 East Riverview Drive Phoenix, AZ 85034	In Proper Person	

By



An Employee of

LEWIS BRISBOIS BISGAARD & SMITH LLP